

EXHIBIT A

AFFADAVIT OF INMATE RONNIE TOWNSEND #I 2II 42

I, Inmate Ronnie Townsend, am over the age of 21 years and am competent to to give the statement heretofore given.

I was transfered from Holman prison to Staton prison in December of 200³~~2~~.

Upon my arrival to Staton I was placed in the Adult Basic Education program.

During that time I witnessed several young inmates be physically abused by defendant, Lt. Copeland. In April of 2004 he made threats at me so I

was seriously concerned that he would carry them out so I called an attorney

that I knew and told him about the incidents and asked him to contact the Warden of the facility about the incidents. After that, Lt. Copeland did not like me because the Warden had gotten onto him about his conduct on the job. After this

Lt. Copeland removed me out of A.B.E. classes and put me on the Farm.

This was clear retaliation for my calling the lawyer. I told Lt. Coplenad that it was wrong to remove me from school without any legitimate justification and that I refused to go onto the farm. He responded by telling me that whether wrong or right---he could do whatever he wanted at that prison.

On 5-24-2004 a call was made for all farmers to report through the "back gate" for "check out".

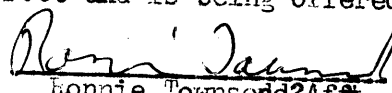
I did not report to the back gate. Lt. Copeland and a--- Capt. Edwards came looking for me. As they walked up to me and called me I went with them to the back gate. When we got there they grabbed me, dragged me out to a truck that was parked outside of the gate and threw me up in the truck... I jumped up on my feet and asked them what was wrong with them...

Why did they take me out of school for ^{KNOW REASON,} ~~the same~~, etc. As I was talking I heard the Lt. waive his hands and tell the driver of the truck to "go-ahead",

The truck pulled off, spinning its tires in gravels. I tried to catch myself but I couldn't, it threw me over the side of the truck; head first... I fell on my shoulder, head and back; my feet touched the ground "behind" my head.... I was in severe pain. All I could do was just lay there... Out of nowhere I felt a strong, hard kick in my side by Lt. Copeland and was dragged back in the inside of the sally port, where I stayed for about an hour; laying on the ground in pain... Instead of them bringing a stretcher to take me to the hospital, Lt. Copeland and two other officers picked me up onto my feet and I fell down again. Lt. told me that I was going to get up and walk to the hospital on my own; which I did eventually.... It took about 25 or so minutes for me to get there; a walk that would only take three minutes max. My back was hurting and my shoulder and neck was "skint-up" from the fall.

The nurse attended my shoulder with paroxide and took X-rays of my back. They put me in a lock up holding cell in the hospital. I was in pain for two weeks and could not get out of bed. Everytime I asked a nurse or officers about seeing a doctor they would tell me that Lt. Copeland told them strictly not to take me out of my cell for anything.....to see anybody..... They wrote me a behavior disciplinary for Creating A Security & Safety Hazard-- to cover up what they did to me, or, to justify it... They did not allow me to attend my own disciplinary hearing which was a denial of due process within itself.... I was in segregation and the hearings ^{HAVE BEEN} held in front of the inmates' cells.

I swear that the above statement is true and correct and is being offered of my own free will and accord...


 Ronnie Townsend? Af#
 Affiant

Ronnie Townsend

Ronnie Townsend?/Affiant

William P. [Signature]
NOTARY PUBLIC
10/3/06

Ronnie Townsend

10/20/08
MY COMMISSION EXPIRES: 10/20/08